
UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

WILLIAM C. EGG, JR.,
6412 Highway 84
Pagosa Springs, CO 81147

Plaintiff,

vs.

Case No. _____

WM. D. SCEPANIAK, INC.
572 4th St So.
PO Box 299
Holdingford, MN 56340

Defendant,

and

FELIX VAZQUEZ ROBLES
1250 W. Badillo Street
Covina, CA 91722

Defendant.

COMPLAINT AND DEMAND FOR JURY TRIAL

Jurisdiction

1. Plaintiff William C. Egg, Jr., is a citizen of the State of Colorado.
2. Defendant Wm. D. Scepaniak, Inc. (hereafter "Scepaniak"), is a corporation organized and existing under the laws of the State of Minnesota, with

its principal place of business in Holdingford, Minnesota.

3. Defendant Felix Vazquez Robles (hereafter "Robles") is a citizen of the State of California.

4. The amount in controversy in this action is in excess of \$75,000, exclusive of interest and costs.

5. This Court has subject matter jurisdiction under 28 U.S.C.A. § 1332.

First Claim for Relief
(Defendant Robles)

6. Plaintiff incorporates herein by reference the allegations contained in paragraphs 1 through 5 hereof as if fully set forth.

7. On June 23, 2017, Plaintiff was driving his 2016 Indian Springfield motorcycle eastbound on US Highway 2 near Crookston, Minnesota, with the right of way, when a tractor-trailer truck owned and operated by the Defendant Scepianiak and driven by Defendant Robles failed to yield the right of way and turned left directly into the path of the Plaintiff, causing the Plaintiff to collide with the Defendant Scepianiak's tractor-trailer truck.

8. Defendant Robles operated the truck in a careless and negligent manner causing serious and permanent injuries to plaintiff, including but not limited to, multiple fractures of the bones in his face, fractures of his lower jaw, the loss of teeth, fracture of the neck of his left femur, comminuted fracture of the

shaft of his left femur, fractured left arm bones, fractured left kneecap, broken ribs, collapsed lung, acute blood loss, and traumatic brain injury, scarring, nerve damage, and permanent physical and psychological impairment.

9. The negligence of the Defendant Robles has resulted in both past and future damages to Plaintiff, including, but not limited to permanent scarring and disfigurement, disability, medical, dental, home care and rehabilitation expenses, property damage, lost income, lost earning capacity, humiliation, embarrassment, pain and suffering, loss of enjoyment of life, and emotional distress in an amount to be determined at trial.

Second Claim for Relief
(Defendants Robles and Scepaniak)

10. Plaintiff incorporates herein by reference the allegations contained in paragraphs 1 through 9 hereof as if fully set forth.

11. At the time of the collision on June 23, 2017, Defendant Robles was an employee of the Defendant Scepaniak and was acting within the scope and course of his authority and his employment by Scepaniak.

12. Defendant Scepaniak is therefore liable to Plaintiff for the injuries, losses, and damages caused by the negligence of its employee, Defendant Robles.

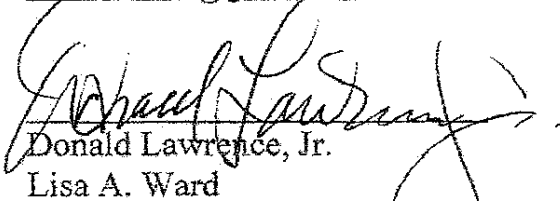
WHEREFORE, Plaintiff demands trial by a jury and prays that he be awarded damages as determined by the jury and that he be awarded his costs,

expert witness fees, expenses, and pre-suit and pre-judgment interest as provided by law.

Dated this 30th day of April, 2019.



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